

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

## ELIZABETH HORTON,

**Plaintiff,**

**VS.**

## MHT-TFM

**DON WILLIAMS, et al.,**

## Defendants.

**CASE NO. 02:06-CV-00526-**

**PLAINTIFF HORTON'S RESPONSE TO**  
**MOTION FOR A PROTECTIVE ORDER**

**COMES NOW**, Plaintiff Horton, by and through her Attorney,  
and submit the foregoing response and offers the following:

1. That this Plaintiff has no objection to the Court granting the Alabama Department of Mental Health and Mental Retardation's Motion for a Protective Order with the conditions cited in the Department's motion.

WHEREUPON, this movant request the following relief:

- a) That the Court enter an Order granting the foresaid Motion;
- b) That the Court allow an “in camera” review of said documents;
- c) That the Court Order contains the conditions cited in the movant’s motion.

**Respectfully submitted** the 23<sup>rd</sup> day of January, 2008.

/s/ Deborah M. Nickson  
Deborah M. Nickson  
Attorney for Plaintiff Horton  
2820 Fairlane Drive  
Montgomery, Alabama 36116  
(334) 213.1233



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CERTIFICATE OF SERVICE

I, Deborah M. Nickson, do hereby certify that a true and correct copy of the foregoing has been served on all counsel and parties of record, by electronically filing this document through the Middle District's electronic filing system which will send notification of such filing to the following on this 23<sup>th</sup> day of January, 2008.

/s/ Deborah M. Nickson  
Deborah M. Nickson  
OF COUNSEL

Hon. Charles A. Stewart, III  
Bradley, Arant, Rose & White LLP  
The Alabama Center for Commerce  
401 Adams Avenue, Ste. 780  
Montgomery, AL. 36104  
Cstewart@bradleyarant.com

Hon. Jack W. Wallace, Jr.  
Office of the Attorney General  
11 South Union Street  
Montgomery, AL. 36130  
JWallace@ago.state.al.us

Hon. Kelly Pate,  
Hon. Dorman Walker  
Balch & Bingham LLP  
P.O. Box 78  
Montgomery, AL. 36101  
DWALKER@balch.com  
kpate@balch.com